Remarks

Claims 1-11 were presented for prosecution and presently stand rejection. Claim 1 and 6-8 stand rejected under 35 USC 102(e) as allegedly being anticipated by Mital et al., U.S. Patent 6,189,012 ("Mital"). Claims 2-3 and 9-10 stand rejected under 35 USC 103(a) as allegedly being unpatentable over Mital in view of Fehskens et al., U.S. Patent Application 6,438,591 (Fehskens). Claims 4-5 stand rejected under 35 USC 103(a) as allegedly being unpatentable over Mital in view of Fehskens, and further in view of Suver, U.S. Patent 6,016,497. Claim 11 stands rejected under 35 USC 103(a) as allegedly being unpatentable over Mital in view of Lynch-Aird, U.S. Patent 6,240,402. Claims 6-7 have been amended herein. Applicant respectfully traverses these rejections for the following reasons.

Applicant submits that claims 1 and 6 are not anticipated by Mital because Mital fails to teach each and every feature of claims 1 and 6, as required by 35 USC 102(e). In particular, Mital fails to teach, *inter alia*, providing multiple hierarchical link tables for use by different application programs, which allows each different application program to use the same node data, but in a different hierarchical structure. For instance, claim 1 recites: "a hierarchical link table, provided for each of said application programs." Claim 6 recites: "a first hierarchical link table for defining a first unique hierarchical structure of the node data for use when the first application program is run ... and a second hierarchical link table for defining a second unique hierarchical structure of the node data for use when the second application program is run."

Mital clearly fails to teach such a feature. In the Office Action, the Examiner alleges that such a feature is taught in column 8, lines 53-58 of Mital, which states:

"drivers, being means of invoking, communication to and instructing programs external to the system of this invention to display any external data/information, where each driver is uniquely related to one **object class**, while one **object class** may be related to more than one driver."

Mital's feature of using drivers is therefore for the purpose of the invoking external programs to obtain external information relating to "object classes." As defined, however, object classes define actual data, e.g., people, cars, etc., and do not provide hierarchical relationships among the data. See for instance, Figure 1 of Mital. Thus, Mital's concept of using drivers to link data objects to external information has nothing to do with the use of different hierarchical link tables for different programs, as recited in claims 1 and 6. This point is further evident given that the Examiner already asserts that Mital's "links classes" teach the concept of Applicant's hierarchical link table. It would therefore be counter-intuitive to assert that the object classes used by the drivers are akin to Applicant's hierarchical link tables.

In addition, claim 6 now recites a database system "wherein the first hierarchical link table includes an identifier that identifies the first application program," and "wherein the second hierarchical link table includes an identifier that identifies the second application program." Mital clearly fails to teach identifiers in the link tables for identifying the table's associated application program.

Furthermore, it should be noted that Mital provides a navigation system, and does not address the issue of providing the same node data in different hierarchical arrangements for different programs. Instead it provides a methodology for managing data in a navigation system,

using a system for linking object classes within the navigation system. There is simply no teaching of arranging data differently for different applications. Accordingly, because Mital fails to teach this feature, Applicant submits that Mital fails to anticipate claims 1 and 6, and therefore Applicant submits that the 35 USC 102(e) rejection is improper and should be withdrawn.

Applicant further traverses the rejection of claims 2-3 and 9-10 under 35 USC 103(a). The Examiner admits that Mital does not teach period data stored as data entries in the data records. Fehskens is cited as allegedly teaching period data in data records, and that it therefore would have allegedly been obvious to modify Mital with the teachings of Fehskens. Applicant respectfully submits that the combination of these two references is improper for numerous reasons, and that such a combination fails to teach or suggest each and every claim element of claims 2-3 and 9-10.

First, Applicant traverses the Examiner's assertion that the motivation to combine the references is "generally available to one skilled in the art ... to reach the desired functionality." Applicant submits that it is not generally known to include time periods in each hierarchical link table "to optionally establish start and end times for each link." (Claim 9). Given the novelty of using different links tables to provide the same node data in different hierarchical arrangements for different programs, Applicant submits that one skilled in the art would not consider putting time periods in a link table to achieve a the functionality recited in claims 2 and 9. Accordingly, without some motivation explicitly taught in the art, the Examiner has failed to provide a prima facie case for obviousness. Moreover, as noted by the Examiner, Fehskens, at best, teaches the

indication of an associated time in management information records (i.e., data records). Nowhere does Fehskens teach or suggest including time information in link tables or the like.

Furthermore, Applicant submits that Fehskens fails to teach the concept of including period data in the fields or data records of a table or database. Instead, Fehskens teaches including time-based parameters in communication *requests* generated within a network management system via a communication dispatch. Requests, which are generated in response to commands from an operator, are routed throughout a system via a kernel (see column 2, line 1-18 and column 10, lines 45-65). The request itself is not stored as a data record or field in a table or database. Rather, each request is a communication used to manage a complex system and any time information is utilized to control the system, e.g., run this process every 15 minutes. Nowhere does Fehskens teach storing time periods as a data record or a field in a table or database, e.g., "to establish start and end times for each link" (claim 9) or "data entry" (claim 10). Thus, neither reference teaches or suggests the use of period data stored in table/database for controlling a data linking process. Moreover, one skilled in the art could not logically or practically combine the teachings of Fehskens with Mital since Fehskens is directed toward a format for packaging electronic communications, while Mital is directed toward a format for accessing database records.

Because the combination of Mital and Fehskens fails to teach or suggest each and every claim element recited in claims 2-3 and 9-10, and because no motivation is provided to combine the references, Applicant submits that a prima facie showing of obvious under 35 USC 103(a)

has not been made. As such, Applicant requests that the claims are in condition for allowance and that the 103(a) rejection be withdrawn.

With regard to claim 7, Applicant has amended the claim to further clarify the points previously raised, namely that, unlike Mital, Applicant's data entries comprise non-relational data. The object instance tables of Mital, conversely, teach only of including links or relational pointers to the actual data.

The remaining claims are believed allowable for the reasons discussed above, as well as for the own additional features.

Applicant respectfully submits that the application as presented is in condition for allowance. Should the Examiner believe that anything further is necessary in order to place the application in better condition for allowance, the Examiner is requested to contact Applicant's undersigned attorney at the telephone number listed below.

Respectfully submitted,

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